UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

SIR EDWARD THOMAS, SR.,)	
)	
Plaintiff,)	
)	
V.)	Case No. 3:14-cv-581-REP
)	
CORRECT CARE SOLUTIONS, LLC,)	
)	
Defendant.)	

AFFIDAVIT OF DANIEL GOODALL

- I, Daniel Goodall, under penalty of perjury, state as follows:
- 1. I am the Grievance Coordinator at the Richmond City Jail in Richmond, Virginia and am the custodian of all of the grievance records during the time of Mr. Thomas' incarceration from October 2011 to April 2012.
- 2. The statements contained in this affidavit are based on my personal knowledge and records maintained in the ordinary and regular course of business and are true and accurate.
- 3. I have personally reviewed the copies of purported grievances provided to me by Correct Care Solutions which are attached to this affidavit as Exhibit 1.
- 4. None of the grievances in Exhibit 1 are in the files maintained by the Richmond City Sheriff's Office located at the Richmond City Jail.
- 5. When such grievances are submitted by inmates, the originals are maintained in the files kept by the Richmond City Sheriff's Office located at the Richmond City Jail.
- 6. Upon receipt, the originals are date-stamped and signed by jail personnel and a log book number is entered on the grievance. A notation cross-referencing the grievance is also made in the log book.

- 6. Upon receipt, the originals are date-stamped and signed by jail personnel and a log book number is entered on the grievance. A notation cross-referencing the grievance is also made in the log book.
- 7. A copy of the grievance, bearing those marks of authenticity, are then provided to the inmate for his or her records.
- 8. This was the protocol for handling inmate grievances at the time of Mr. Thomas' incarceration and has continued to the present.
- 9. The copies of the grievances in Exhibit 1 do not bear any of the marks of authenticity that would demonstrate that they had ever been submitted to the grievance department.
 - 10. Further, there are no entries in the log book cross-referencing these grievances.
- 11. Specifically, the grievance dated which bears the date of March 3, 2012 with the log number "21" does not exist in our logbook as having been submitted to our grievance department.
- 12. In March of 2012, grievances received by the grievance department would begin with log number "6300" and proceed sequentially.
- 13. All inmates have access to blank grievance forms throughout the jail. Inmates are not prevented from taking blank forms with them when they are discharged from the jail.
- 14. Based on my knowledge and experience as the Grievance Coordinator at the Richmond City Jail, it is my conclusion that none of the grievances provided to me for review by Correct Care Solutions, were ever submitted or filed during his incarceration at the Richmond City Jail.

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I swear or affirm that the foregoing statements are true to the best of my knowledge, information and belief.

Dated this <u>25</u> day of September, 2014.

Daniell Goodall

Grievance Coordinator

COMMONWEALTH OF VIRGINIA City of Richmond

This day personally appeared before me, a notary public, Danielle Goodall, and made oath that the foregoing is true and correct to the best of her knowledge, information and belief.

Given under my hand this 25th day of September, 2014.

Hamelawordy - Eatin Notary Public Notary Public

Richmond Shariff's Office Richmond City Jall



1701 Pairfield Way
Richmond, Virginia 23223

OF: Sheriff Wily
Collin Mily Lot medical file

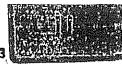
INMATE GRIEVANCE FORM

Deter 3-3-1	Assigned Housing Location: D31 Log Number: 21
Inmato's Name:	SIR Thomas Immate Number: 45120
Data Received:	Grievance Coordinator:
	INSTRUCTIONS:
. · •	Please print all information on the grievance form
•	Only one grievance concern on each grievance form
	You will be notified in writing by the Grievance Coordinator of the action taken on your grievance concern within nine (9) working days of the receipt of your grievance by the grievance coordinator
In no way will the you for filling this City Jail.	lling of this grievance effect your status in the Juli, nor will there be any reprisal against grievance. Grievances will not become a part of your classification. file at the Richmond.
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Richmond Sheriff's Office Richmond City Jall



1701 Fairfield Way Richmond, Virginis 23223



INMATE GRIEVANCE FORM

Inmate's Name:						
	Will ?	[PHOMAS	· b	mate Number:	<u> </u>	
Date Received:		Grievance Co	ordinator:			
		INSTRUCTIO)NS:			•
	Please pr	int all information o	m the grievance	e form		
	Only one	grievance concern	on each grievan	ice form		
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Richmond Sheriff's Office Richmond City Jail



1701 Fairfield Way Richmond, Virginia 23223

INMATE GRIEVANCE FORM

Date: 7- of	Assigned Housing Location: HOL Log Number:				
Immate's Name:	Sia Thomas Immete Number:				
Date Received:	Grievence Coordinator:				
	Instructions:				
	Please print all information on the grievance form				
•	Only one grievance concern on each grievance form				
You will be notified in writing by the Grievance Coordinator of the action taken on your grievance concern whilm nine (9) working days of the receipt of your grievance by the grievance coordinator					
In no way will the j you for filling this p City Jail.	filing of this grievance effect your status in the fail, nor will there be any reprisal against grievances. Grievances will not become a part of your classification file at the Richmond				
GRIEVANCE STA	TEMENT:				
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What Action Are Y	ou Requesting:				
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1					
Immate Signature:	Date: \$ /2				
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